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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

NATIONAL AUDUBON SOCIETY, *et al.*,

Plaintiffs,

v.

DEBRA HAALAND, in her official capacity
as Acting Secretary of the United States
Department of the Interior, *et al.*,

Case No. 3:20-cv-00206-SLG

Defendants,

and

STATE OF ALASKA,

Intervenor-Defendant.

JOINT STATUS REPORT

In accordance with the Court's order (ECF 30) dated May 13, 2021, the parties provide the following status report and request the Court extend the current

stay for an additional 60 days.

Defendants sought the stay in this litigation in order to allow new officials in the Department of the Interior (“DOI”) the opportunity to review the 2020 Integrated Activity Plan (“IAP”) for the National Petroleum Reserve-Alaska, as well as this litigation. Due to the volume of natural resource matters under review by new administration officials, some of whom have only recently started in their positions with the Department, additional time is necessary to complete review of this matter.

Accordingly, Defendants hereby seek to continue the stay of all proceedings in this action for a period of 60 days to and including September 7, 2021. This brief extension of the stay will continue to conserve the time and resources of the parties and the Court. Defendants intend within that time period to determine their next steps with regard to the IAP and to identify those steps for the parties. Defendants will identify the next steps with regard to the IAP for the parties not less than fourteen days prior to the end of the 60-day period and in advance of informing the Court. Not later than the end of the 60-day period, the undersigned parties will file a joint status report advising the Court what further proceedings may be necessary, or will file separate status reports setting out their proposals if necessary.

Undersigned counsel have conferred with counsel to the other parties. Plaintiffs do not oppose the requested extension of the stay and authorize undersigned counsel to submit this as a joint status report. However, they are

concerned about a scenario in which the Department of Interior defends the ROD at the end of the stay and proceeds with a lease sale in late fall or winter, as this is typically the time when lease sales are held in the NPR-A. Plaintiffs have a strong interest in resolving their challenge to the ROD before any such sale is held. Thus, if such a scenario occurs, they will likely request an expedited briefing schedule, including a rapid filing of the record. Intervenor-Defendant State of Alaska (“SOA”) takes no position on the instant motion. However, SOA notes that DOI has had nearly six months to conduct its review of this matter to determine how to proceed, and SOA is likely to oppose any additional extensions or delays of this matter.

DATED: July 9, 2021.

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JOINT STATUS REPORT REGARDING STAY